



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001

April 15, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: CG Docket Nos. 09-158

Dear Ms. Dortch:

On April 13, 2011, Jeffrey Smith of Comcast Cable Communications, LLC and the undersigned of Comcast Corporation spoke by conference call with Colleen Heitkamp, William Freedman, and John B. Adams of the Consumer and Governmental Affairs Bureau. During the conference call, we provided the following information in response to questions posed by the FCC staff concerning Comcast's practices with respect to early termination fees, minimum term contracts and promotional offerings.

Minimum term contracts and early termination fees. FCC staff asked about Comcast's minimum-term contracts and the associated early termination fees (ETFs). We explained that the number of Comcast subscribers who receive service under a minimum-term contract, rather than on a month-to-month basis, and who are therefore subject to an early termination fee is very small. We explained that Comcast's minimum-term contracts generally last one or two years and generally include a fee for early cancellation.

FCC staff asked what the amounts were of the ETFs imposed by Comcast. We explained that ETFs are associated with contracts that include either an award, such as a television or prepaid card, or a significantly discounted rate from the currently offered rates for a specific period of time. The amount of the ETF varies depending upon the terms of the particular contract the customer has agreed upon. The typical range is \$75 to \$150. For contracts accompanied by an award, the amount of the ETF would not exceed the value of the award. For contracts that provide a discounted rate, the ETF typically represents no more than 50% of the rate differential over the course of the contract. Comcast's ETFs are pro-rated and decline over the period of the contract in quarterly increments.

FCC staff asked how Comcast informs customers about the terms and conditions associated with minimum-term contracts. We explained that, at the point of sale, customers are informed of the conditions that attach to a minimum-term agreement, including any fees for early termination and the

pro-rata methodology. Customers have a 30-day rescission right from the date of service activation on any minimum-term agreement. Once the customer has agreed to the contract, the customer receives the terms and condition of the contract in writing by mail or email.

In response to a question from the FCC staff, we explained that the remaining balance of an ETF is not displayed on the customer's bill but that the customer can contact Comcast at any time to obtain that information.

Promotional offerings. In response to a question from the FCC staff, we stated that the duration of Comcast's promotional offerings varies. For example, promotions may last three months, four months, or six months but in general will not exceed one year. At the point of sale for a promotional offer, the customer is told what the rate will be at the expiration of the promotional period, based on current rates. The customer receives a bill notification when the promotion is due to expire for longer term promotions.¹

Contact information on Comcast bills. In response to a question from the staff, we stated that Comcast does not provide FCC contact information on its subscribers' bills. We explained that, pursuant to Section 76.952 of the Commission's rules, 47 C.F.R. §76.952, Comcast subscribers' monthly bills include the name, mailing address and phone number of the franchising authority unless the franchising authority requests Comcast to omit such information.² Comcast bills also provide the FCC community unit identifier for the cable system.

Please let me know if you have any questions.

Sincerely,

/s/ Mary McManus

Mary McManus

Cc: John B. Adams
William Freedman
Colleen Heitkamp

¹ Letter to Marlene H. Dortch, Secretary, from Mary McManus, Comcast Corporation, CG Docket No. 09-158, Mar. 4, 2011, Att. 2.

² *Id.*